

NICHOLAS A. TRUTANICH
United States Attorney
District of Nevada
Nevada Bar Number 13644
LINDA MOTT
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6059
Fax: (702) 388-5087
linda.j.mott@usdoj.gov

Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

TRAYVALE HARRISON,

Defendant.

Case No. 2:18-cr-144-JAD-GWF

**STIPULATION TO CONTINUE
SENTENCING HEARING**
(First Request)

COMES NOW the United States of America, through Nicholas A. Trutanich, United States Attorney, and Linda Mott, Assistant United States Attorney, counsel for the United States of America, and Jennifer Waldo, counsel for Defendant Trayvale Harrison, and requests that the sentencing hearing currently scheduled October 28, 2019, be vacated and set to a date and time convenient to this Court, but no sooner than ninety (90) days.

The request is for the following reasons:

1. Additional time is needed to formulate and file any sentencing memorandums, procure any possible witnesses that would be at sentencing to either speak on behalf of Defendant Harrison, or on the behalf of the government.

1 2. Counsel for Defendant Harrison agrees with this continuance.

2 3. Defendant Harrison is in custody and agrees with this continuance.

3 4. Thus, all parties agree to this continuance.

4 5. The additional time requested herein is not sought for purposes of delay, but
5 merely to allow counsel to have sufficient time to solidify any witnesses needed, and to
6 review and prepare any sentencing memorandums.

7 This is the first request to continue filed herein.

8 DATED this 24th day of October, 2019.

9
10 NICHOLAS A. TRUTANICH
United States Attorney

11 */s/ Linda Mott*
12 By _____
LINDA MOTT
13 Assistant United States Attorney

14
15 */s/ Jennifer Waldo*
16 _____
JENNIFER WALDO
17 Counsel for Defendant
TRAYVALE HARRISON

Case No. 2:18-cr-144-JFD-GWF

Plaintiff,

PROPOSED ORDER

V.

TRAYVALE HARRISON,

Defendant.

FINDINGS OF FACT

Based on the Stipulation of the parties, and good cause appearing therefore, the Court finds that:

1. The government, as well as Counsel for defendant Harrison, need additional time to formulate and file any sentencing memorandums, as well as locating any witnesses who may speak either on the behalf of Harrison, or on behalf of the government.

2. Defendant Harrison is in custody and does not object to the continuance.

3. The Government is in agreement with this continuance.

4. The additional time requested herein is not sought for purposes of delay, but to allow the parties to continue to prepare any sentencing memorandums, secure witnesses who may speak on behalf of the defendant, or the government, and to allow counsel for defendant to these options with her client.

///

///

///

///

///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24

DATED this 24th day of October, 2019.

JENNIFER A. DORSEY
UNITED STATES DISTRICT JUDGE